

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA : SUPERSEDING  
: INFORMATION  
-v- :  
JOHN CAMPOS, : S7 10 Cr. 336 (LAK)  
: Defendant. :  
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The United States Attorney charges:

1. From at least in or about 2006, up through and including on or about April 14, 2011, the three leading internet poker companies doing business in the United States were PokerStars, Full Tilt Poker and Absolute Poker/Ultimate Bet (collectively, the "Poker Companies"). Because United States banks were largely unwilling to process payments for an illegal activity such as internet gambling, the Poker Companies principally relied on one of two tactics to process billions of dollars in payment transactions from United States residents who gambled through the Poker Companies. First, the Poker Companies and their agents lied to United States banks about the nature of the poker transactions they were processing and covered up those lies through the creation of phony corporations and websites to disguise payments to the Poker Companies. Second, the Poker Companies and their agents sought to identify small banks on the brink of failure and to offer such banks millions of dollars in

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investment in return for agreeing to process the poker transactions.

2. At all times relevant to this Information, JOHN CAMPOS, the defendant, was the Vice Chairman of the Board of Directors and part owner of SunFirst Bank ("SunFirst") in St. George, Utah. CAMPOS also earned income as a "consultant" to SunFirst and, as of the fall of 2009, owed at least \$1 million in loans to SunFirst. In the summer and fall of 2009, SunFirst, as CAMPOS knew, faced the threat of closure by bank regulators because of its poor financial condition.

3. In or around September 2009, a payment processor serving Pokerstars and Full Tilt Poker proposed to JOHN CAMPOS, the defendant, an investment of \$10 million in SunFirst in return for processing internet poker transactions - an investment that would make the payment processor the bank's single largest owner. SunFirst's attorney warned CAMPOS that processing internet poker transactions would violate the law. In a September 29, 2009 e-mail the SunFirst attorney advised CAMPOS that "[b]anks and bankers are not immune from prosecution" and that "proceeds from gambling in possession of the bank" could be "subject to seizure and forfeiture." CAMPOS responded by e-mail that the bank's lawyer was "up to his old tricks again, being a wet blanket" and proceeded to finalize the deal for SunFirst to process poker transactions in return for investment.

4. In or about November 2009, SunFirst began processing payments for Pokerstars and Full Tilt Poker. SunFirst processed over \$200 million of payments for PokerStars and Full Tilt Poker through on or about November 9, 2010, when the FDIC issued an order directing the bank to immediately cease all third party payment processing. SunFirst earned approximately \$1.6 million in fees for this processing, which was by far its largest source of income. On or about November 3, 2011, bank regulators ordered the closure of SunFirst for lack of capital.

Statutory Allegations

5. From in or about November 2009, up through and including in or about November 2010, in the Southern District of New York and elsewhere, JOHN CAMPOS, the defendant, knowingly caused a State nonmember insured bank to deal in bets used as a means and substitute for participation in a lottery as that term is defined in Title 12, United States Code, Section 1829A, namely, an arrangement whereby three or more persons (the "participants") advance money and credit to another in exchange for the possibility and expectation that one or more but not all of the participants (the "winners") will receive by reason of their advances more than the amounts they have advanced, the identity of the winners being determined by any means including a game and contest, in violation of Section 20 of the Federal Deposit Insurance Act, to wit, CAMPOS caused SunFirst to accept

monies paid by U.S. residents to Pokerstars and Full Tilt Poker as bets in connection with online poker.

(Title 18, United States Code, Sections 1306 and 2.)

  
Preet Bharara  
PREET BHARARA  
United States Attorney

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- v -

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(18 U.S.C. Section 1306)

PREET BHARARA  
United States Attorney.

3/28/12  
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Defendant John Campos present w/attorneys  
Frederick J. Hertz & Kathleen Cass, Jr. AVSAs  
Arla Dorkin-Brown & Andrew Goldstein pres.  
Court Reporter present. (57) Superseding information  
filed in open court. Defendant was allocuted and the  
Court reserved decision on acceptance of the guilty  
plea until review of the PSR, and the parties' submissions  
due on 5/27/12. Sentencing is tentatively scheduled  
for 6/27/12 @ 2:30pm. PSI was ordered. The  
defendant remains released on bail. Hearing duration  
was 30 minutes.

Kaplan, J.